



PUGET SOUND
FREIGHT LINES • TRUCK LINES

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July 30, 1993

QA 17944
FHWA - Docket #MC-93-12
Room 4232, HCC-10
Office of Chief Counsel, FHWA
400 7th St. S.W.
Washington D.C. 20590

Dear Sir;

Puget Sound Truck Lines is responding to the request for comments on the proposed rulemaking regarding Training for All Entry Level Drivers of Commercial Motor Vehicles.

It is our belief that the trucking industry has done an admirable job of voluntarily training entry level drivers and that a mandatory regulation is simply not necessary and would do little to achieve a higher level of public safety.

It is already a routine good business practice to train an entry level driver under the supervision of a skilled driver. The legal liability of placing an inexperienced driver on the road by themselves is simply too great. Responsible companies already adequately train entry level drivers; the proposed regulation would add an unnecessary expense involving record keeping that we estimate would cost several hundred dollars per driver.

An additional reason the training standard is not needed is that the CDL regulations have provided the trucking industry with much more knowledgeable drivers. While true that the CDL is a licensing standard, not a training standard, a large degree of training actually takes place in studying the CDL manual and successfully passing the exam. Today's drivers are much more aware of defensive driving techniques, air brake operation, and handling hazardous materials than they were prior to CDL testing.

We would hate to see regulations so restrictive and burdensome that potential young drivers choose the path of least resistance and simply enter career fields other than truck driving.

Sincerely,

Howard A. Stirk

Howard A. Stirk
Vice President
Maintenance & Safety

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